



# CALIFORNIA ENVIRONMENTAL PROTECTION AGENCY



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LINDA S. ADAMS  
SECRETARY FOR  
ENVIRONMENTAL PROTECTION

ARNOLD SCHWARZENEGGER  
GOVERNOR

Certified Mail: 7003 1680 0000 6167 7206

January 26, 2010

Mr. Farhad Mansourian, Director  
Marin County Public Works Department  
3501 Civic Center Drive, Room #304  
San Rafael, California 94903

Dear Mr. Mansourian:

The California Environmental Protection Agency (Cal/EPA), California Emergency Management Agency, and the Department of Toxic Substances Control, conducted a program evaluation of the Marin County Certified Unified Program Agency (CUPA) on November 3 and 4, 2009. The evaluation was comprised of an in-office program review and a field oversight inspection by State evaluators. The evaluators completed a Certified Unified Program Agency Evaluation Summary of Findings with your agency's program management staff. The Summary of Findings includes identified deficiencies, a list of preliminary corrective actions, program observations, program recommendations, and examples of outstanding program implementation.

The enclosed Evaluation Summary of Findings is now considered final and based upon review, I find that Marin County Public Works Department's program performance is satisfactory with some improvement needed. To complete the evaluation process, please submit Deficiency Progress Reports to Cal/EPA that depict your agency's progress towards correcting the identified deficiencies. Please submit your Deficiency Progress Reports to Mary Wren-Wilson every 90 days from the date of this letter; the first report is due on May 4, 2010.

Cal/EPA also noted during this evaluation that the Marin County Public Works Department has worked to bring about a number of local program innovations, including the updated Area Plan and efficient integration of the City of San Rafael CUPA programs. We will be sharing these innovations with the larger CUPA community through the Cal/EPA Unified Program website to help foster a sharing of such ideas statewide.

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Thank you for your continued commitment to the protection of public health and the environment through the implementation of your local Unified Program. If you have any questions or need further assistance, you may contact your evaluation team leader or Jim Bohon, Manager, Cal/EPA Unified Program at (916) 327-5097 or by e-mail at [jbohon@calepa.ca.gov](mailto:jbohon@calepa.ca.gov).

Sincerely,

[Original Signed by Don Johnson]

Don Johnson  
Assistant Secretary  
California Environmental Protection Agency

Enclosure

cc: Sent via e-mail:

Ms. Julia Barnes  
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Mr. Michael Frost  
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State Water Resources Control Board  
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cc: Sent via e-mail:

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## **CERTIFIED UNIFIED PROGRAM AGENCY EVALUATION SUMMARY OF FINDINGS**

**CUPA: Marin County Department of Public Works,  
Waste Management Division**

**Evaluation Date: November 3-4, 2009**

### **EVALUATION TEAM**

**Cal/EPA: Mary Wren-Wilson**

**Cal/EMA: Brian Abeel**

**DTSC: Asha Arora**

This Evaluation Summary of Findings includes the deficiencies identified during the evaluation, program observations and recommendations, and examples of outstanding program implementation activities. The evaluation findings are preliminary and subject to change upon review by state agency and CUPA management. Questions or comments can be directed to Mary Wren-Wilson at (916) 323-2204.

	<b><u>Deficiency</u></b>	<b><u>Preliminary Corrective Action</u></b>
<b>1</b>	<p>The CUPA Annual Summary Reports 2, 3, and 4 did not accurately reflect the activities of the CUPA during the past three reporting years.</p> <p>For example:</p> <ul style="list-style-type: none"><li>• Report 3 for Fiscal Year (FY) 2008/2009 shows multiple inspections on the single Cal ARP facility, when there were actually only 2 inspections total between 2006 and 2009.</li><li>• Report 2 for FY's 2006-2009 show no stationary sources under the Cal ARP program, when in reality, there is 1 stationary source.</li><li>• The Annual Single Fee Summary Report (Report 2) for the FY 2006/2007 shows that the CUPA's total for Permit by Rule (PBR) is 2 and Conditional Exemption (CE) is 3. Report 3 shows that the CUPA's total Onsite Hazardous Waste Treatment (PBR, CA, CE) is 5. Report 3 shows that the CUPA's total RCRA Large</li></ul>	<p>With the first Evaluation Update due May 4, 2010, the CUPA will submit an action plan outlining how they will ensure the accuracy of future Annual Summary reports.</p> <p>With the second Evaluation Update due August 2, 2010, the CUPA will submit the following amended information for Annual Summary Reports 2, 3, 4 for Fiscal Years 2006-2009:</p> <ul style="list-style-type: none"><li>• Report 2- Provide total number of Hazardous Waste Generators which include RCRA LQG; PBR; CA; and CE facilities</li><li>• Report 3- Provide inspection summaries for the above referenced facilities</li><li>• Report 4- Provide enforcement summary for the above</li></ul>

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	<p>Quantity Generators (LQGs) is 6 and Recyclers is 5. Upon discussion with the staff, it was discovered that the CUPA's total regulated Onsite Hazardous Waste Treatment, LQGs, and Recyclers universe are not clearly determined on the Reports due to inaccuracies in the database number extractions.</p> <ul style="list-style-type: none"> <li>• Report 3 shows that for FY 2006/2007, the CUPA conducted 160% of the routine hazardous waste inspections. Upon discussion with staff it was determined that the follow up inspections were being reported in the "routine" inspection column rather than "other" inspections.</li> <li>• The Annual Single Fee Summary Report (Report 2) for the FY 2007/2008 shows that the CUPA's total for PBR is 2 and CE is 1. Report 3 shows that the CUPA's total for PBR/ CA/ CE is 3. Report 3 shows that the CUPA's total for LQGs is 10 and Recyclers is 5. Upon discussion with the staff, it was discovered that the CUPA's total regulated Onsite Hazardous Waste Treatment, LQGs, and Recyclers are not clearly determined on the Reports due to inaccuracies in the database number extractions.</li> <li>• Report 2 for the FY 2008/2009 shows that the CUPA's total for PBR is 2 and Report 3 also shows that the CUPA's total PBR/ CA/ CE is 2. Report 3 shows that the CUPA's total for LQGs is 14. Upon discussion with the staff, it was discovered that the CUPA's total regulated Onsite Hazardous Waste Treatment and LQGs are not clearly identified on the Reports due to inaccuracies in the database number extractions.</li> <li>• Report 3 for FYs 2006/2007 and 2007/2008 does not contain the number of routine inspections that returned to compliance (RTC) for LQGs, Recyclers, and PBR/CA/CE.</li> <li>• In the Annual Enforcement Summary Report (Report 4) for the FY 2006/2007, the CUPA only reported 1 formal action for the hazardous waste generator, but discussion with staff indicated that no formal action was taken. In addition, Report 4</li> </ul>	<p>referenced facilities</p> <p>By September 30, 2010, the CUPA will ensure that single fee, inspections and enforcement actions are accurately reported in the 2009/2010 Annual Summary Reports 2, 3, and 4. A copy of this report shall be submitted with the fourth Evaluation Update due October 31, 2010.</p> <p>(It is noted by the evaluation team that the CUPA will be switching to a new data management system for FY 2009/2010 and this may help to alleviate the inconsistent reporting numbers that have been submitted in the past.)</p>
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	<p>does not contain the correct number of informal enforcement actions and penalty amounts.</p> <ul style="list-style-type: none"> <li>In the Annual Enforcement Summary Report (Report 4) for the FY 2007/2008, the CUPA only reported 31 informal actions for the hazardous waste generators, which included 1 for the onsite hazardous waste treatment program. Discussion with staff indicated that no informal actions were taken during this fiscal year.</li> </ul> <p><b>CCR, Title 27, Section 15290 (a)</b> <b>CCR, Title 23, Sections 2713 (c) [Cal/EPA, DTSC, Cal EMA]</b></p>	
2	<p>The CUPA has not consistently implemented their Inspection and Enforcement (I&amp;E) Plan.</p> <p>For example:</p> <ul style="list-style-type: none"> <li>Documenting facility RTC and CUPA follow-up actions is required as part of the CUPA's implementation of its Inspection and Enforcement (I and E) plan.</li> </ul> <ol style="list-style-type: none"> <li>On June 13, 2008, the CUPA completed its technical review of the North Marin Water District – Stafford Lake Water Treatment Plant's RMP. At that time, the CUPA visually observed at the facility the changes to the RMP (table of contents and associated pages), and requested that those changes be submitted to the CUPA. During the June 26, 2009 facility inspection, the CUPA again requested those changes be submitted to the CUPA. To this date, the CUPA has not received those changes.</li> <li>In some cases, the CUPA is not following-up and/or documenting RTC for businesses cited for violations in Notices to Comply and inspection reports/Notices of Violation. Out of 13 files reviewed by DTSC, 2 files did not contain evidence of RTC or CUPA follow-up documentation. Below are some businesses that were cited for violations, but documentation of RTC or CUPA follow-up was not found:</li> </ol>	<p>By the first Evaluation Update due May 4, 2010, the CUPA will submit documentation showing follow-up with businesses cited for violations and document RTC actions.</p> <p>An action plan or schedule for the types and dates of training for hazardous waste generator training to staff on the identification and citation of hazardous waste violations training shall be provided to Cal/EPA with the first Evaluation Update due May 4, 2010.</p> <p>With the second Evaluation Update due August 2, 2010, the CUPA will submit to Cal/EPA an action plan showing how it will follow-up with businesses with violations on a more consistent basis.</p>

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	<p style="text-align: center;">-Bio Research Tech - inspected on 6/6/07 -Golden Gate Ferry - inspected on 4/21/04</p> <ul style="list-style-type: none"> <li>The CUPA is not correctly classifying violations as outlined in their I&amp;E Plan. Out of the 13 files reviewed, DTSC noted that 5 out of 13 files showed violations were not properly classified: <ul style="list-style-type: none"> <li>3 files showed failure to conduct weekly or daily tank inspections as minor violation.</li> <li>4 files showed failure to provide training as a minor violation.</li> <li>4 files showed incorrect citation of a contingency plan for SQGs/CESQGs.</li> <li>1 file showed incorrect citation for not following universal waste standards.</li> </ul> </li> </ul> <p><b>CCR, Title 27, Section 15200 (a)(9)</b>  <b>HSC 25187.8(b), 25110.8.5, 25117.6</b>  <b>HSC, Chapter 6.11, Section 25404.1.2 (c) [Cal/EPA, Cal EMA and DTSC]</b></p>	
<b>3</b>	<p>The CUPA's current Inspection and Enforcement Plan (I&amp;E Plan) does not meet all of the Unified Program requirements.</p> <p>For example:</p> <ul style="list-style-type: none"> <li>The CUPA's Chart 1A: "Selecting an Appropriate Enforcement Response" allows up to 70 days for Notice to Comply corrective action documentation. State law requires "A person who receives a notice to comply detailing a minor violation shall have not more than 30 days from the date of the notice to comply in which to correct any violation cited in the notice to comply. Within five working days of correcting the violation, the person cited or an authorized representative shall sign the notice to comply, certifying that any violation has been corrected, and return the notice to the UPA."</li> <li>The CUPA's I&amp;E plan does not appear to have been updated since 2007. This deficiency was also cited during the last CUPA evaluation of 2006.</li> </ul>	<p>With the second Evaluation Update due August 2, 2010, the CUPA shall submit a copy of the newly approved I&amp;E plan to Cal/EPA for review.</p>

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	<p><b>CCR, Title 27, Section 15200 (b)</b> <b>HSC, Chapter. 6.11, Section 25404.1.2 (c)(1) [Cal/EPA]</b></p>	
4	<p>The CUPA did not demonstrate that its staff had been adequately trained in the identification of hazardous waste violations for the large quantity generators (LQGs) and small quantity generators (SQGs)/ conditionally exempt small quantity generators (CESQGs). Below are some businesses that were incorrectly cited:</p> <ul style="list-style-type: none"> <li>• European Car Service - inspected on 2/20/08. The violations cited were for LQG facilities rather than SQG.</li> <li>• PG&amp;E – inspected on 10/7/09 and 9/9/06 (DTSC oversight inspections). The inspection did not address all LQG requirements.</li> </ul> <p>In addition, the CUPA did not conduct a complete oversight inspection on 10/7/09. During the oversight inspection of PG&amp;E San Rafael Service Center, 1220 Anderson St., San Rafael, the CUPA inspector missed the following LQG hazardous waste violations:</p> <ul style="list-style-type: none"> <li>• Failure to check emergency equipment, such as fire extinguishers and eyewash/showers,</li> <li>• Failure to maintain aisle space</li> <li>• Failure to ask or request if facility had obtained tank/secondary containment for used oil tank.</li> </ul> <p><b>HSC, Chapter 6.5, Section 25123.3 (h)</b> <b>CCR, Title 22, Sections 66261.7 (f), 66262.34(d), and 66262.34(f)</b> <b>CCR, Title 27, Section 15200 (b)</b> <b>CCR, Title 27, Section 15260 (a) (3) (B) [DTSC]</b></p>	<p>The CUPA will provide hazardous waste generator training to staff on the identification and citation of hazardous waste violations training.</p> <p>With the first Evaluation Update report due May 4, 2010, the CUPA will submit to Cal/EPA action plan or schedule for the types and dates of training. Upon training is completion, confirmation documentation shall be submitted to Cal/EPA.</p>
5	<p>The CUPA is not following up on all hazardous waste generator complaints referred by DTSC.</p> <p>The CUPA had not followed up on 4 out of the 8 complaints that were referred by DTSC.</p> <ul style="list-style-type: none"> <li>• Apartment Complex Laundry Facility- Fairfax</li> <li>• Joe and Beverly Vandra- Mill Valley</li> <li>• BioMarin Pharmaceutical Mfg.- Novato</li> <li>• Donald Leroy Moore- San Rafael</li> </ul> <p><b>CCR, Title 27, Sections 15290 (g) [DTSC]</b></p>	<p>The CUPA shall follow up on all complaints that are referred by DTSC. After completing the complaint investigation, the CUPA shall submit the outcome of each complaint to <a href="mailto:nlancaster@dtsc.ca.gov">nlancaster@dtsc.ca.gov</a></p>



Certified Unified Program Agency (CUPA)  
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**CUPA Representative**

Michael Frost  
(Print Name)

Original Signed  
(Signature)

**Evaluation Team Leader**

Mary Wren-Wilson  
(Print Name)

Original Signed  
(Signature)

Certified Unified Program Agency (CUPA)  
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**PROGRAM OBSERVATIONS AND RECOMMENDATIONS**

*The observations and recommendations provided in this section address activities the CUPA are implementing and/or may include areas for continuous improvement not specifically required of the CUPA by regulation or statute.*

1. **Observation:** Due to the CUPA absorbing the City of San Rafael program, there were many numbers on the Annual Reports that changed greatly between FY 06-08.

**Recommendation:** Cal/EPA recommends that, to help explain any extreme changes or other noteworthy items present on the Annual Reports, the CUPA may include footnotes on the reports or explanations in the Annual Self Audit document may be useful to those reviewing those reports.

2. **Observation:** The CUPA is currently waiting for approval of a new I&E Plan. During the evaluation it was noted that there are some corrections that will need to be made to this new plan before it will meet all Unified Program requirements

**Recommendation:** Cal/EPA recommends that, in the future, the CUPA should consider submitting the Draft I&E documents to Cal/EPA, DTSC, Cal EMA, and SWRCB for review prior to beginning the approval process.

3. **Observation:** The CUPA completed its technical review of the North Marin Water District – Stafford Lake Water Treatment Plant’s RMP in 2008. The RMP will need to be updated in 2013. This facility is the only stationary source within the CUPA’s jurisdiction.

**Recommendation:** None

4. **Observation:** The CUPA divided the Marin County into 4 districts (North, East Central, West Central and South). Each inspector has a district and is responsible for all CUPA activities in that district. This has proven to be effective and efficient for travel time and knowledge of the area. Every six years the inspectors are rotated from one district to another. This rotation enables an inspector to look at the facilities from a different perspective.

**Recommendation:** None

5. **Observation:** The CUPA regularly conducts joint inspections with San Rafael Fire Department, Federal EPA, County Stormwater Pollution Prevention program, and State Air Resources Board. The joint inspections ensure no inspection redundancies and make it a more streamlined process so businesses can focus on conducting business. For example, the UST inspections for tank removals are coordinated and inspected jointly by fire prevention and CUPA personnel. These joint inspections allow two agencies to work together that have some cross over requirements that saves the business time and money.

**Recommendation:** None

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- 6. Observation:** The CUPAs is currently planning public classes covering hazardous materials spill response and alternative dry cleaning methods. The CUPA has invited Cal EMA to assist. These classes will educate the businesses how to properly notify and report spills. The class will also educate businesses on alternative dry cleaning methods that could enable them to opt out of the Unified Program by using non-hazardous materials to conduct business.

**Recommendation:** None

- 7. Observation:** The CUPA developed SPCC guidance documents (fact sheets) and facility inspection records and updated County ordinance to incorporate SPCC program and fees. All four CUPA inspectors have participated in and passed the APSA training.

**Recommendation:** None

- 8. Observation:** A small percentage (less than %10) of the business plan files reviewed contained business plans forms that were not completely filled out:

- Missing the chemical location or having the site address listed as the chemical location rather than the location on the site on the Hazardous Materials Inventory – Chemical Description form
- Missing site map or having a map that did not depict the exact location of the chemical location
- Missing the owner/operator or designated representative signature on the Business Owner/Operator Identification form
- Missing the date when the owner/operator or designated representative signed the Business Owner/Operator Identification form.

**Recommendation:** Cal EMA recommends the CUPA take a two phase approach to improving upon on the observation noted by:

- Providing training to the inspectors on the standard operating procedures for ensuring the business plan forms are completely and accurately filled out
- Audit the files maintained by specific inspectors to ensure that the inspectors are following the standard operating procedures and the business plan forms are completely and accurately filled out.

- 9. Observation:** The CUPA does not classify violations as Class 1, Class 2, or minor in its inspection reports.

**Recommendation:** Cal/EPA recommends that the CUPA begin classifying violations as Class 1, Class 2, or minor on its inspection reports. The CUPA may modify its inspection reports to include checkbox columns where classifications may be recorded by inspectors. Documenting the violation classifications in this way will allow for better efficiency when violation data is entered into the CUPA's data management system.

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**10. Observation:** The CUPA exercises a graduated series of enforcement action as stated in its Inspection and Enforcement (I and E) Plan, but the plan does not address the elevation of violation classifications when violations have not been corrected by the correction due date.

**Recommendation:** Cal/EPA recommends that the CUPA address the elevation of violation classifications along with its follow-up actions in the I and E plan.

**11. Observation:** The CUPA is unsure about their number of hazardous waste and tiered permitting facilities.

**Recommendation:** DTSC recommends that the CUPA implement a QA/QC procedure to ensure that the facilities are regulated by the correct hazardous waste generator law. Also, this will ensure that the facilities are regulated under the correct treatment tier.

**12. Observation:** Inspection reports issued by the CUPA do not include observations or other information in enough detail to determine if those items are violations, observations, or suggestions.

**Recommendation:** DTSC recommends CUPA to include observations or other information in enough detail to determine if those items are violations, and document violations that have been corrected in the field as observations.

**13. Observation:** The CUPA is unsure about the number of LQGs and tiered permitting facilities.

**Recommendation:** DTSC recommends that the CUPA implement a QA/QC procedure to ensure that the facilities are regulated by the correct hazardous waste generator law. Also, this will ensure that the facilities are regulated under the correct treatment tier.

**14. Observation:** The CUPA has access to and routinely use a camera to document violations at UST facilities.

**Recommendation:** SWRCB recommends that the CUPA continue to routinely use their camera to document violations. Photographs are useful to document violations and the conditions at facilities. Photographs could help strengthen your case should enforcement become necessary. Always remember to date stamp photographs.

**15. Observation:** While the current staff is doing an admirable job of implementing the CUPA program, significant improvement could be achieved with full staffing in place.

**Recommendation:** Cal/EPA recommends that the CUPA fill the available Hazards Materials Supervisor position as soon as possible.

Certified Unified Program Agency (CUPA)  
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## **EXAMPLES OF OUTSTANDING PROGRAM IMPLEMENTATION**

- 1. Updated Area Plan, July 2008:** The CUPA updated their Area Plan July 2008. In 2006, the CUPA absorbed the City of San Rafael CUPA programs from the City of San Rafael Fire Department, which included the responsibility for the city's Area Plan. At the time of the 2006 CUPA evaluation, the CUPA's area plans had not been reviewed and revised in the past three years; City of San Rafael May 2001 & Marin County April 2003. The CUPA developed an action plan for reviewing both area plans, updating information and incorporating the City of San Rafael's Area Plan into the Marin County Area Plan. The action plan consisted of two phases: (1) review of and update information in both plans; (2) consolidate both plans, update information, and exercise the consolidated Area Plan with several local emergency response agencies. The CUPA received an HMEP grant to cover 80% of the costs for phase one, which ran between October 2006 and September 2007. The CUPA received an HMEP grant to cover 80% of the costs for phase two, which ran October 2007 and September 2008.

The CUPA has received an HMEP grant to cover 80 % of the costs to review Marin County's existing hazardous material response capabilities and ensure the Area Plan is still current. This grant runs October 2009 through September 2010.

- 2. Efficient Integration of City of San Rafael CUPA Programs:** In 2006, the CUPA absorbed the City of San Rafael CUPA programs from the City of San Rafael. At the time of absorption, 90% of the Unified Program businesses (approximately 400) in the City of San Rafael were unregulated.

The CUPA initiated outreach to the businesses in the City of San Rafael required to comply with the Unified Program. In 2007, the CUPA and Cal EMA jointly conducted a Business Plan and Spill Reporting/Notification class for businesses from the City of San Rafael. At the time of the class, the businesses were provided a business plan package and were assisted in filling out the package.

During the first round of inspections, the CUPA's approach was to first educate and assist the businesses to understand the laws and regulations they must comply with. The CUPAs prioritized which businesses to inspect based on the last known inspection of these businesses. For example, those businesses last inspected in 2002 were inspected before those businesses last inspected in 2003.

San Rafael Fire Prevention notifies the CUPA when they come across businesses not complying with the Unified Program.

As of 2009, all businesses required to comply with the Unified Program were inspected by the CUPA.